

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION

UNITED STATES OF AMERICA

v.

CHRISOVALANTIS LAKHIANI,  
*Defendant.*

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Case No. 5:20mj54

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Kelly C. Good, do state as follows:

1. On or about September 27, 2020, I responded to the area of Milepost 44 on Skyline Drive near Crescent Rock Overlook, which is located in the Shenandoah National Park, for a report of a domestic argument. I located a silver-colored passenger vehicle with its hazard lights on pulled over in the northbound lane. I observed two individuals outside of the vehicle, one male and one female.
2. The female approached me and appeared to be crying. The male was in the brush on the side of the road. The male stated, "is there a taxi service or shuttle service? I just want to get out of here." I asked if the female was okay. She nodded yes and I put her in the back of my vehicle.
3. I identified the male as **Chrisovalantis LAKHIANI** by his valid District of Columbia driver's license (DL# 3687208). **LAKHIANI** stated that he owned the vehicle.
4. I later identified the female as [REDACTED]. While talking with [REDACTED] she explained to me that she and **LAKHIANI** had been fighting on and off since the day prior. She called 911 because she was afraid that **LAKHIANI** was going to run them off the road and because, at one point, **LAKHIANI** told her that he would just jump off an overlook. [REDACTED] told me that **LAKHIANI** had broken up with her a few days before coming out

to the park, but then unexpectedly showed up at her apartment on September 26, 2020, the day before the incident. **LAKHIANI** and [REDACTED] then traveled to Shenandoah National Park for a few days. **LAKHIANI** began verbally fighting with her on September 26, 2020 and it continued into Sunday, September 27, 2020, the day of the incident.

5. While meeting with [REDACTED] she showed me a video that she had taken of her and **LAKHIANI** on Skyline Drive just prior to calling 911. [REDACTED] stated she began to record it after realizing **LAKHIANI** was not behaving rationally. [REDACTED] indicated she was afraid to be in the vehicle with **LAKHIANI** and that she had repeatedly asked **LAKHIANI** to pull the car over so they could talk about things. The video provided by [REDACTED] indicates that during their argument, **LAKHIANI** revs the engine of his vehicle and screams at [REDACTED] "Be quiet! Stop, Stop!" At one point there is an audible slap in the video, followed by [REDACTED] asking, "Ow, so you're going to hit me? You're going to hit me?" **LAKHIANI** then says, "Yep. Cause I'm crazy!"
6. The video continues, and [REDACTED] continues to beg **LAKHIANI** to pull the car over. **LAKHIANI** continues to drive the vehicle and there is audible revving of the engine.
7. During a subsequent interview on September 28, 2020, [REDACTED] acknowledged that **LAKHIANI** had hit her while in the vehicle and that the assault occurs at approximately the four-minute mark on the video. [REDACTED] subsequently provided pictures of the slap mark resulting from **LAKHIANI**'s assault.

### **CONCLUSION**

8. Based upon the foregoing facts, I respectfully submit that there is probable cause to conclude that on or about September 27, 2020, **Chrisovalantis LAKHIANI** did violate

Title 18, United States Code, Section 113(a)(4), Assault by Striking, Beating, or Wounding.

**OATH**

The information in this affidavit is true to the best of my knowledge and belief.

Respectfully submitted,

s/Kelly C. Good

Kelly C. Good

U.S. Park Ranger

Shenandoah National Park

Received by reliable electronic means, and sworn and attested to by telephone on

this 27<sup>th</sup> day of October 2020.

A handwritten signature in black ink, appearing to read "Joel C. Hoppe", is written over a horizontal line.

JOEL C. HOPPE

UNITED STATES MAGISTRATE JUDGE